

Memorandum of Agreement

Between the

National Spent Nuclear Fuel Program Office

and the

Department of Energy Idaho Operations Office

for

**Coordination of Quality Assurance Activities and Flow-Down of Technical Requirements
Associated with DOE-Owned Spent Nuclear Fuel**

Purpose

This Memorandum of Agreement (MOA) documents coordination of the National Spent Nuclear Fuel (NSNF) Program Quality Assurance (QA) activities between the NSNF Program Office and the Department of Energy, Idaho Operations Office (DOE-ID) as well as QA activities to be performed by the Idaho National Engineering and Environmental Laboratory (INEEL) management and operating (M&O) contractor under DOE-ID direction. This MOA also addresses the flow-down of technical requirements to DOE-ID and the implementation of technical requirements by the INEEL M&O contractor and other DOE-ID contractors.

Agreement

The NSNF Program Office and support organizations work with the Office of Civilian Radioactive Waste Management (OCRWM); the Office of Project Completion Idaho Office (EM-41); the Office of Nuclear Material and Spent Fuel (EM-21); DOE-ID; and the DOE-ID contractors to coordinate Spent Nuclear Fuel (SNF) activities and to provide programmatic communications and resources to ensure acceptance of SNF into a Nuclear Regulatory Commission (NRC)-licensed SNF repository.

Coordination of Quality Assurance Activities

DOE-ID contractually delegates responsibility for execution of the QA function to their INEEL M&O contractor. The INEEL M&O contractor is required to establish a QA program that meets DOE/RW-0333P, *Quality Assurance Requirements and Description* (QARD) (Reference 3) for items and activities that affect the acceptance of DOE-owned SNF in an OCRWM-managed Nuclear Regulatory Commission (NRC)-licensed SNF repository.

Consistent with the QARD, DOE-ID transmits the following submittals and subsequent revisions received from its INEEL M&O contractor to the NSNF Quality Assurance Program Manager (QAPM):

- SNF QA Program Requirements Matrix with associated implementing documents directly specifying where QARD requirements are met, where QARD requirements are not applicable based on scope of work, and where exceptions to the QARD requirements have been taken with justification for the exceptions.
- SNF QA Policy Statement directing mandatory compliance with the QARD Program
- SNF Q-List
- SNF-related quarterly evaluation and assessment schedules;
- SNF-related quarterly QA program information reports containing the following information as a minimum: accomplishments (QA), results of assessment activities, problems and adverse conditions, and lessons learned.

To ensure compliance with the latest revision(s) of the QARD the following actions between DOE-ID and the INEEL M&O should be completed and submitted to the NSNF QAPM:

- Review and evaluate the latest revision changes of the QARD to determine whether the changes will affect the effectiveness of the INEEL M&O's non-licensed SNF QARD program.
- If, the latest revision changes of the QARD will affect the effectiveness of the INEEL M&O's non-licensed SNF QARD program, DOE-ID will assist the INEEL M&O in implementing the latest changes of the QARD.
- Submit the review and evaluation with a schedule for implementing the changes and/or the circumstances explaining the exceptions to implementing the changes.

Flow-Down of Technical Requirements

Consistent with Reference 1, the NSNF Program Office and support organizations work with the Office of Civilian Radioactive Waste Management (OCRWM) to identify or develop EM technical baseline documents for DOE spent nuclear fuel and related items necessary for repository licensing and operations.

The NSNF Program Office coordinates with OCRWM to obtain RW concurrence with EM technical baseline documents. With concurrence from the Office of Nuclear Material and Spent Fuel (EM-21) and the Office of Project Completion Idaho Office (EM-41), EM technical baseline documents, other technical requirements, and changes thereto are approved and issued to DOE-ID by the NSNF Program Office.

DOE-ID contractually delegates responsibility for implementation of the technical baseline documents and other technical requirements to the INEEL M&O contractor and requires implementation of the technical requirements for DOE spent nuclear fuel designated for future

shipment from Idaho to a NRC-licensed SNF repository.

Certain technical baseline documents and other technical requirements may require the creation of site specific deliverables for transmittal to the NSNF Program Office (example: SNF Site Specific Compliance Documents).

Assessments by NSNF QAPM

The NSNF QAPM, working through DOE-ID, assesses the INEEL M&O contractors' QA program(s) for effectiveness and implementation of technical requirements.

DOE-ID requires its INEEL M&O contractor to provide access to facilities, personnel, and records to support NSNF QAPM assessment activities.

Observers

Both the NSNF Program Office and DOE-ID agree that OCRWM, NRC, as well as representatives from affected units of state and local government, will be permitted, consistent with security access and safety rules, to observe the QAPM assessments of the DOE-ID M&O Contractor's implementation of technical requirements. When necessary, and due to possible lack of internal NSNFP resources, the NSNFP QAPM may use RW personnel to assist in assessments of the DOE-ID M&O contractor's SNF QA Program.

References

1. Memorandum of Agreement for Acceptance of Department of Energy Spent Fuel and High-Level Radioactive Waste, between the Assistant Secretary for Environmental Management, U.S. Department of Energy, Washington, D.C. and the Director Office of Civilian Radioactive Waste Management, U.S., DOE, Washington, D.C., January 1999, Revision 1.
2. Memorandum of Agreement between the Deputy Assistant Secretary, Office of Nuclear Material and Facility Stabilization (EM-60), Office of Environmental Management, Headquarters, Washington, D.C., and the Director, Office of Quality Assurance (RW-3), Office of Civilian Radioactive Waste Management, entitled, "Coordination and Implementation of Quality Assurance Activities Associated with DOE-Owned Spent Nuclear Fuel," signed July 25, 1997.
3. DOE/RW-0333P, Office of Civilian Radioactive Waste Management, *Quality Assurance Requirements and Description* (QARD).

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DOE Idaho Operations Office

09/19/01

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